

Christian H. Dribusch (507021)  
Chapter 7 Trustee  
187 Wolf Road  
Albany, New York 12205  
(518) 227-0026

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

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In re:

KRIS DANIEL ROGLIERI

Chapter 7

*Debtor.*

Case No. 24-10157

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**NOTICE OF TRUSTEE INTENT TO PROCEED ON SALE OF  
40 NORTH ROAD, QUEENSBURY, NEW YORK**

**PLEASE TAKE NOTICE**, that Christian H. Dribusch, Chapter 7 Trustee to the Kris Daniel Roglieri bankruptcy estate intends to proceed with a proposed sale of 40 North Road, Queensbury, New York based upon a cash purchase offer of \$1,600,000, and respectfully states as follows:

1. The Trustee has received a cash purchase offer of \$1,600,000 on the 40 North Road, Queensbury, New York property (“Offer”) with an anticipated closing date of June 30, 2025.
2. The Trustee provides this notice as preliminary introductory information. The Trustee preserves all rights with respect to the assertion of any claim described herein or otherwise.
3. Any proposed sale will be subject to United States Bankruptcy Court approval and will be made pursuant to 11 U.S.C. §363(f). If the Trustee is unable to proceed with a sale under 11 U.S.C. §363(f), then the Trustee reserves the right to seek to abandon 40 North Road, Queensbury, New York pursuant to 11 U.S.C. §554.

4. Upon information and belief, the following parties have or may assert secured claims of not less than the following amounts:

- KeyBank (1<sup>st</sup> Mortgage) \$640,000<sup>1</sup>
- KeyBank (2<sup>nd</sup> Mortgage) \$315,000
- NYS Income Tax Lien \$558,732.30

5. Upon information and belief, Toadflax Nursery has filed an alleged post-petition mechanic lien in the approximate amount of \$28,500.

6. Chapter 7 Debtor bankruptcy estate has incurred the following expenses:

- Homeowner Insurance \$17,830
- House Winterization \$16,050
- Pool Winterization \$1,000
- Lawn Mowing \$1,400
- Locksmith \$481.64

7. Upon information and belief, the Debtor has previously indicated a desire to assert a homestead exemption of up to \$102,400.

8. Upon information and belief, the Debtor asserts that National Grid may have a claim for utility services of approximately \$20,101.24.

9. The estimated realtor fees based upon the Offer are approximately \$64,000.

10. The Trustee will be proposing to retain real estate counsel at the cost of approximately \$2,000.

11. The estimated recording fees are anticipated to be approximately \$7,000.

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<sup>1</sup> Upon information and belief, KeyBank may have advanced post-petition school and property taxes.

12. The sale may be subject to capital gains tax, but the Trustee currently has insufficient data on the bankruptcy estate basis to make an estimate.

13. The estimated Trustee commission based upon the Offer would be approximately \$48,000.00.

14. The Trustee business rational for sale is that application of 11 U.S.C. §724, treatment of certain liens, together with potential reductions of claims, may facilitate additional funds for the benefit of unsecured creditors from the sale of other bankruptcy estate property.

15. The Trustee expressly reserves all objections, rights and claims.

Dated: March 25, 2025

/s/ Christian H. Dribusch

Christian H. Dribusch

Chapter 7 Trustee

**CERTIFICATE OF SERVICE**

CHRISTIAN H. DRIBUSCH, certifies:

I am over the age of 18 years and reside in Delmar, New York. On March 25, 2025, I sent the Trustee Notice Of Trustee Intent To Proceed On Sale Of 40 North Road, Queensbury, New York as follows:

Kris Daniel Roglieri  
11 Hill Top Lane  
Poughkeepsie, NY 12603

On March 25, 2025, the trustee response was also served upon the parties who appear on the ECF/PACER for the case.

Dated: March 25, 2025

/s/ Christian H. Dribusch  
Christian H. Dribusch